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RUGGED LAW, INC.

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Attorney for Plaintiffs

IN THE FEDERAL DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORLTAND DIVISION

JASMINE ELLIS, an Individual,
 TYREL BEERY, an Individual,
 MICHELLE LIEBE, an Individual,
 JENNIFER (RUBY) CHAVEZ, an Individual,
 JILL BRANDT, an Individual,
 ELIZABETH TARRIES an Individual

Plaintiff,

v.

OREGON HEALTH AND SCIENCE
 UNIVERSITY, an independent public
 corporation,

Defendant.

Case No. 3:23-CV-01555-JR

DECLARATION OF COUNSEL IN
 SUPPORT OF RESPONSE TO MOTION TO
 COMPEL

I, Paul Janzen, Counsel for Plaintiffs, declare as follows:

1.

I am an attorney licensed to practice law in the State of Oregon and am the attorney of record representing Plaintiff Beery in the above-captioned case. I make this declaration based on my own personal knowledge.

2.

Attached as Exhibit 1 is a copy of an email showing that our office has produced all required documents and discovery pleadings requested by defendant in its motion to compel.

3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 28th day of March, 2025.

RUGGED LAW, INC.

By /s/ Paul Janzen

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Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing pleading on all counsel of record on the date set forth below via the Court's CM/ECF filing system.

DATED this 28th day of March, 2025.

RUGGED LAW, INC.

By /s/ Paul Janzen

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Attorneys for the Plaintiff